

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SANDRA FRANKLIN,

Plaintiff,

vs.

DOLGENCORP, LLC

Defendant.

CASE NO.: 8:20-CV-0039-LSC

**JOINT MOTION TO EXTEND
DEADLINE TO FILE STIPULATION
OF DISMISSAL**

COME NOW the parties in the above-styled cause and respectfully request additional time to file their joint stipulation of dismissal and in support thereof state as follows:

1. The parties report to this honorable Court that they have reduced their settlement agreement to writing and are in the process of circulating same for execution, but require additional time to consummate the agreement.

2. In light of the foregoing, counsel respectfully request this honorable Court to extend the deadline to file the joint stipulation of dismissal by thirty (30) days.

3. This motion is filed in good faith and is not interposed for purposes of delay.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request this honorable court extend the deadline by which the parties must file their joint stipulation of dismissal by thirty (30) days.

Respectfully submitted this 14th day of July, 2020.

Edward I. Zwilling, Esq.
Law Office of Edward I. Zwilling,
LLC
4000 Eagle Point Corporate Dr.
Birmingham, Alabama, 35242

John V. Matson, Esq.
Koley Jessen P.O. L.L.P
One Pacific Place, Ste. 800
1125 South 103rd Street
Omaha, NE 68124

Telephone: (205) 822-2701
Email:
edwardzwilling@zwillinglaw.com

Telephone: (402) 390 9500
Email: John.Matson@koleyjessen.com

By: s/Edward I. Zwillling
Edward I. Zwillling

By: s/ John V. Matson
John V. Matson